



SHIM &
CHANG

ATTORNEYS AT LAW
A LAW CORPORATION

September 26, 2006

Kenneth J. Mansfield, Esq.

Via fax at 524-8293

Re: Engle v. Liberty Mutual

Dear Mr. Mansfield:

While we are waiting for your review and response to our letter to Dr. Lau earlier today regarding his deposition, we got an interesting call from Dr. Lau's office indicating that he wants \$1,000 paid to him or he will not comply with the subpoena, and he wants more money if his deposition goes more than an hour. Enclosed is his rate sheet that was faxed to us. In this case, where Dr. Lau is a factual witness, not a treating physician, nor an expert witness, and where he entered into a business arrangement with Liberty Mutual in order to supply it with a letter upon which it based its denials, we are having trouble seeing why we should pay him to comply with a subpoena. Please give me a call to discuss this as soon as you can. We may need to file a motion to compel his compliance with the subpoena.

Very truly yours,

SHIM & CHANG
Attorneys at Law

By



ROY K. S. CHANG
HARVEY M. DEMETRAKOPoulos

HMD:rrm

CLIFFORD K.H. LAU, M.D., F.A.C.S.*Orthopaedic Surgery*

Queen's Physicians' Office Building II
1329 Lusitana Street, Suite 501
Honolulu, Hawaii 96813

Telephone
(808) 522-9633

Physicians' Exchange
(808) 524-2575

Legal Consultation:

<u>Description</u>	<u>Amount</u>	
Client Examination	\$300.00	
Court Room-from time I leave office to time I return	\$1000.00	For 1 st hour or fraction or if canceled 5 days or less in advanced
	\$750.00	For each additional hour or fraction of hour
In-house legal consult (Deposition)	\$250.00 \$250.00 \$500.00 \$1000.00	1 st 15 minutes 2 nd 15 minutes add'l 30 minutes Total for 1 st hour
		2 nd hour will be prorated. If canceled less than 5 working days in advance, charge will be for one hour.
Outer Island Courtroom		Same as above courtroom charges, but the hours will include travel time for all working hours spent away from the office.
Phone consultations		Same as In-house consultations
For depositions and court appearances		There will be a \$1000.00 deposit required at the time of scheduling.
No show/late cancellations for IME/PPD		\$350-\$500 will be charge for any IME/PPD CS/RS less than 5 working days.

HP LaserJet 3200

HP LASERJET 3200

SEP-26-2006 3:30PM



Fax Activity Log

Job	Date	Time	Type	Identification	Duration	Pages	Result
806	9/21/2006	12:26:25PM	Send	5861369	1:17	7	OK
807	9/21/2006	12:27:47PM	Send	5230759	1:24	7	OK
808	9/21/2006	12:39:51PM	Send	18082441013	1:13	7	OK
809	9/21/2006	2:11:45PM	Send	5452307	1:55	3	OK
810	9/21/2006	3:32:09PM	Send	5861237	0:28	1	OK
811	9/21/2006	3:43:50PM	Send	5377809	0:37	2	OK
812	9/21/2006	4:16:26PM	Receive	8085379430	0:44	5	OK
813	9/22/2006	11:02:06AM	Send	5229646	0:27	1	OK
814	9/22/2006	11:03:14AM	Receive	8085217489	0:36	3	OK
815	9/22/2006	11:15:11AM	Send	5218185	0:54	2	OK
816	9/22/2006	11:47:54AM	Receive	808 5358444	0:24	2	OK
817	9/22/2006	12:20:38PM	Send	9460520	0:28	1	OK
818	9/22/2006	1:01:50PM	Send	9557925	0:27	1	OK
819	9/22/2006	1:03:29PM	Send	9557925	0:25	1	OK
820	9/22/2006	3:43:43PM	Receive	808 524 6690	0:20	1	OK
821	9/22/2006	4:46:09PM	Receive	808 5380214	0:31	1	OK
822	9/23/2006	9:41:50AM	Send	5992979	0:31	1	OK
823	9/25/2006	8:45:33AM	Receive	8085938843	1:13	3	OK
824	9/25/2006	9:54:24AM	Send	5381833	1:11	7	OK
825	9/25/2006	10:21:56AM	Receive	8085226491	0:23	2	OK
826	9/25/2006	11:29:47AM	Send	5381833	2:48	19	OK
827	9/25/2006	1:10:46PM	Receive		1:00	2	OK
828	9/25/2006	1:55:47PM	Send	5992979	0:32	1	OK
829	9/25/2006	1:56:24PM	Send	5219648	0:23	1	OK
830	9/25/2006	1:58:23PM	Receive	+1 808 521 7749	1:12	3	OK
831	9/25/2006	2:20:02PM	Send	5219648	0:23	1	OK
832	9/25/2006	2:20:47PM	Send	5475880	0:24	1	OK
833	9/25/2006	4:25:19PM	Receive	808 527 7102	1:18	3	OK
834	9/26/2006	12:46:59AM	Receive		0:36	0	No Fax Detected
835	9/26/2006	7:52:33AM	Receive	Fax	0:28	1	OK
836	9/26/2006	8:31:24AM	Receive	8085226491	0:35	2	OK
837	9/26/2006	11:12:28AM	Send	5229646	0:29	1	OK
838	9/26/2006	11:13:14AM	Send	5248293	0:33	1	OK
839	9/26/2006	11:29:36AM	Receive	808 955 7925	0:31	2	OK
840	9/26/2006	12:00:57PM	Send	5277102	0:47	1	OK
841	9/26/2006	12:01:50PM	Send	5246690	0:53	1	OK
842	9/26/2006	12:02:49PM	Send	5281656	0:29	1	OK
843	9/26/2006	12:49:45PM	Send	9557925	0:24	1	OK
844	9/26/2006	2:39:56PM	Receive	8085368715	0:18	1	OK
845	9/26/2006	3:28:25PM	Send	5248293	0:40	2	OK ✓